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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

D-1 Michael Fraley, Jr.,
a/k/a "Sarge,"

D-2 Alexandria N. Dodge,

Defendants.

Case:4:21-cr-20184

Judge: Leitman, Matthew F.

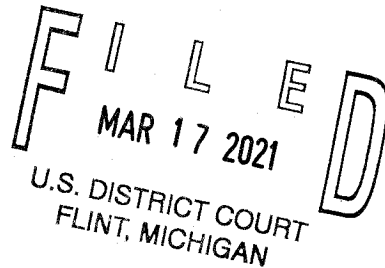
MJ: Ivy, Curtis

Filed: 03-17-2021 At 02:38 PM

SEALED MATTER (TT)

Violations:

21 U.S.C. §§ 841(a)(1)



INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

(21 U.S.C. §§ 841(a)(1) & (b)(1)(B)(viii) - Distribution of Methamphetamine)

D-1 Michael Fraley, Jr.

1. On or about December 1, 2020, in the Eastern District of Michigan, defendant, Michael Fraley, Jr., a/k/a Sarge, knowingly and intentionally distributed 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(B)(viii).

COUNT TWO

(21 U.S.C. §§ 841(a)(1) & (b)(1)(A)(viii) - Distribution of Methamphetamine)

D-2 Alexandria N. Dodge

2. On or about December 3, 2020, in the Eastern District of Michigan, defendant, Alexandria N. Dodge, knowingly and intentionally distributed 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers, a Schedule II controlled substance.

All in violation of 21 U.S.C. §§ 841(a)(1) and 841(b)(1)(A)(viii).

FORFEITURE ALLEGATION

3. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set for in this Indictment.

4. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or

- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL

s/Grand Jury Foreperson

GRAND JURY FOREPERSON

SAIMA S. MOHSIN
Acting United States Attorney

ANTHONY VANCE
Chief, Branch Offices

s/Blaine Longworth

BLAINE LONGSWORTH

Assistant United States Attorney

Dated: 3-17-2021

United States District Court
Eastern District of Michigan

Criminal Case Cover Sheet

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete the following information.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input type="checkbox"/> No	AUSA's Initials: F I L E D

Case Title: USA v. MICHAEL FRALEY, JR., ET AL

County where offense occurred : Genesee

U.S. DISTRICT COURT
FLINT, MICHIGAN

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/ ☐ Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

Defendant name

Charges

Prior Complaint (if applicable)

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

March 17, 2021
Date

s/BLAINE T. LONGSWORTH

BLAINE T. LONGSWORTH, AUSA
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Attorney Bar #: P55984

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.